

Stuart G. Gross (SBN 251019)
Ross A. Middlemiss (SBN 323737)
Travis H.A. Smith (SBN 331305)
GROSS KLEIN PC
The Embarcadero
Pier 9, Suite 100
San Francisco, CA 94111
(415) 671-4628

Attorneys for Plaintiffs and the Proposed Classes
[additional counsel listed on signature page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

BRAND LITTLE and ROBIN BURNS,
Individually and on Behalf of All Others Similarly
Situated,

Plaintiffs,
v.

**PACIFIC SEAFOOD PROCUREMENT, LLC;
PACIFIC SEAFOOD PROCESSING, LLC;
PACIFIC SEAFOOD FLEET, LLC; PACIFIC
SEAFOOD DISTRIBUTION, LLC; PACIFIC
SEAFOOD USA, LLC; DULCICH, INC.;
PACIFIC SEAFOOD – EUREKA, LLC;
PACIFIC SEAFOOD – CHARLESTON, LLC;
PACIFIC SEAFOOD – WARRENTON, LLC;
PACIFIC SEAFOOD – NEWPORT, LLC;
PACIFIC SEAFOOD – BROOKINGS, LLC;
PACIFIC SEAFOOD – WESTPORT, LLC;
PACIFIC SURIMI – NEWPORT LLC; BLUE
RIVER SEAFOOD, INC.; SAFE COAST
SEAFOODS, LLC; SAFE COAST SEAFOODS
WASHINGTON, LLC; OCEAN GOLD
SEAFOODS, INC.; NOR-CAL SEAFOOD,
INC.; KEVIN LEE; AMERICAN SEAFOOD
EXP, INC.; CALIFORNIA SHELLFISH
COMPANY, INC.; ROBERT BUGATTO
ENTERPRISES, INC.; ALASKA ICE
SEAFOODS, INC.; LONG FISHERIES, INC.;
CAITO FISHERIES, INC.; CAITO
FISHERIES, LLC; SOUTHWIND FOODS,
LLC; FISHERMEN’S CATCH, INC.;
GLOBAL QUALITY FOODS, INC.; GLOBAL
QUALITY SEAFOOD LLC; OCEAN KING**

Case No. 3:23-cv-01098-AGT

**PLAINTIFFS’ NOTICE OF
WITHDRAWAL OF MOTION TO
COMPEL NONPARTY OCEAN
FRESH, LLC TO COMPLY
WITH PLAINTIFFS’
DOCUMENT SUBPOENA**

Date: September 26, 2025
Time: 2:00 p.m.
Courtroom: A, 15th Floor
Judge: Alex G. Tse

GROSS KLEIN PC
THE EMBARCADERO
PIER 9, SUITE 100
SAN FRANCISCO, CA 94111

**FISH INC.; SOUTH BEND PRODUCTS LLC;
SWANES SEAFOOD HOLDING COMPANY
LLC; BORNSTEIN SEAFOODS, INC.;
ASTORIA PACIFIC SEAFOODS, LLC; DA
YANG SEAFOOD INC.; GREAT OCEAN
SEAFOOD INC. and DOES 32-60,**

Defendants.

GROSS KLEIN PC
THE EMBARCADERO
PIER 9, SUITE 100
SAN FRANCISCO, CA 94111

TO THE COURT AND TO ALL PARTIES AND THEIR COUNSEL OF RECORD:
PLEASE TAKE NOTICE that, pursuant to Local Civil Rule 7-7(e), Plaintiffs hereby withdraw,
without prejudice, their Motion to Compel Nonparty Ocean Fresh, LLC to Comply with
Plaintiffs' Document Subpoena, filed on August 20, 2025 (Dkt. No. 384). Plaintiffs request that
the hearing set for September 26, 2025 be taken off-calendar.¹

Respectfully Submitted,

Dated: September 3, 2025

GROSS KLEIN PC

By: /s/ Stuart G. Gross

STUART G. GROSS

Stuart G. Gross (SBN 251019)
Travis H. A. Smith (SBN 331305)
Ross A. Middlemiss (SBN 323737)

GROSS KLEIN PC

The Embarcadero
Pier 9, Suite 100
San Francisco, CA 94111
(415) 671-4628

sgross@grosskleinlaw.com
tsmith@grosskleinlaw.com
rmiddlemiss@grosskleinlaw.com

Matthew W. Ruan (SBN 264409)
Samantha Gupta (*admitted pro hac vice*)

**FREED KANNER LONDON &
MILLEN LLC**

100 Tri-State International, Suite 128
Lincolnshire, IL 60069
(224) 632-4500

mruan@fklmlaw.com
sgupta@fklmlaw.com

Matthew S. Weiler (SBN 236052)
Raymond S. Levine (SBN 348030)

**SCHNEIDER WALLACE COTTRELL
KONECKY, LLP**

2000 Powell Street, Suite 1400
Emeryville, CA 94608
(415) 421-7100

mweiler@schneiderwallace.com
rlevine@schneiderwallace.com

¹Plaintiffs' request to take the September 26, 2025 hearing off calendar applies only to Plaintiffs' Motion to Compel as to nonparty Ocean Fresh, LLC, and not its separate motions to compel as to nonparties Anna's Seafood (Dkt. No. 383) and Tillamook Bay Seafoods, Inc. (Dkt. No. 385).

GROSS KLEIN PC
THE EMBARCADERO
PIER 9, SUITE 100
SAN FRANCISCO, CA 94111

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Steven N. Williams (SBN 175489)
STEVEN WILLIAMS LAW, P.C.
201 Spear St, Suite 1100
San Francisco, CA 94105
(415) 671-4628
swilliams@stevenwilliamslaw.com

*Counsel for Plaintiffs and the Proposed
Classes*

PROOF OF SERVICE

I, Ian Atkinson-Young, declare:

I am a citizen of the United States and employed in San Francisco, California. I am over the age of eighteen years and not a party to the within-entitled action. My business address is Pier 9, Suite 100, The Embarcadero, San Francisco, CA 94111. On September 3, 2025, I served a copy of the following documents:

**PLAINTIFFS' NOTICE OF WITHDRAWAL OF MOTION TO COMPEL
NONPARTY OCEAN FRESH, LLC TO COMPLY WITH PLAINTIFFS'
DOCUMENT SUBPOENA**

☒ **BY MAIL:** by enclosing the above-described documents in a sealed envelope, with first-class postage thereon fully prepaid, and deposited the envelope with the United States Postal Service at Beaverton, OR on this date, to the following address:


Ocean Fresh, LLC
c/o Susan A. Juntz
344 N. Franklin Street
Fort Bragg, CA 95437

*Agent for Service of Process – Ocean
Fresh, LLC*

I declare under the penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct.

Executed September 3, 2025.

By: _____


Ian Atkinson-Young

GROSS KLEIN PC
THE EMBARCADERO
PIER 9, SUITE 100
SAN FRANCISCO, CA 94111